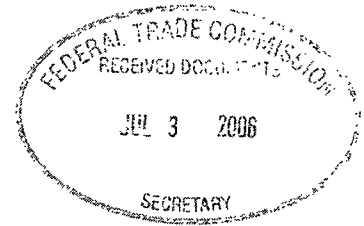


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**Robert E. Underwood**  
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June 26, 2006

Federal Trade Commission  
Office of the Secretary  
Room H-135 Annex W  
600 Pennsylvania Avenue NW  
Washington, DC 20580

RE: Business Opportunity Rule R511993

Dear Sir or Madam;

It has come to my attention that your agency is proposing new rules and conditions as it pertains to the Direct Selling Industry. I applaud your and other government agencies efforts and goodwill towards protecting the public at large as well as people like me who are determined to create and maintain a profitable and ethical career as a Direct Marketer.

In your proposal, R511993, there are points that would unfairly place me at a disadvantage as far as timing and/or practicality. Goodness knows there is already a burdensome amount of paperwork in this business without the addition of keeping detailed records of who I talk to regarding my business opportunity. Next, the 7 day waiting period would put me at a great disadvantage with new prospects as they would potentially have to wait before starting their new business. This is not necessarily true in buying a used car or starting a new job with a government entity, so why Direct Sales. Having to disclose the lawsuit information without distinguishing between losing and winning can make an impression that this may be less than a legitimate business. Again, why Direct Sales?

Lastly, with the requirement of references I would lose control of my business and contact list for potential unfavorable competitive reasons against my business.

In general I am opposed to your changes for a variety of reasons, mainly that I'm being singled out as a business with more stringent rules than others who are self employed or working as an employee in a marketing environment. Your proposed rules also impose additional and burdensome work on my business that is not required of others. This potentially could have a great negative impact on my livelihood and could cause me to